

Tom Buchele, OSB # 081560  
Earthrise Law Center  
10101 S. Terwilliger Blvd.  
Portland OR 97219-7799  
Tel: 503-768-6736  
Fax: 503-768-6642  
Email: tbuchele@lclark.edu

Jesse A. Buss, OSB # 122919  
Willamette Law Group  
411 Fifth Street  
Oregon City OR 97045-2224  
Tel: 503-656-4884  
Fax: 503-608-4100  
Email: jesse@WLGpnw.com

Attorneys for Plaintiff Blue Mountains Biodiversity Project

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

**BLUE MOUNTAINS BIODIVERSITY,  
PROJECT, an Oregon nonprofit corporation,  
DECLARATION OF**

Plaintiff,

v.

**SHANE JEFFRIES, in his official capacity  
as Ochoco National Forest Supervisor; and  
UNITED STATES FOREST SERVICE,  
an agency of the United States Department  
of Agriculture,**

Defendants.

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Case No. 2:20-cv-2158-MO

**DECLARATION OF  
PAULA HOOD IN SUPPORT  
PLAINTIFF'S MOTION  
FOR REMAND WITH  
PARTIAL VACATUR**

I, Paula Hood, state and declare as follows:

1. I reside in Oregon and my mailing address is 1560 Chambers Street, Eugene, Oregon 97402. I have personal knowledge of the facts set forth below.

2. I am one of the Co-Directors of the Blue Mountains Biodiversity Project (“BMBP”) and I have served in this role since 2014 (approximately 8 years).

3. BMBP did not receive actual notice regarding the Forest Service’s June 2019 public meeting regarding the Walton Lake Project, and therefore could not send a representative to attend that meeting.

4. After I later learned that the meeting had occurred, I contacted Forest Supervisor Jeffries via email to determine why BMBP had not been notified about it. That email and his response are in the administrative record. AR 6037–38. He claimed the notice was sent to multiple “news outlets[.]”

5. However when I subsequently reviewed the email notification list the Forest Service used for the June 2019 meeting, *see* AR 8486–87, I saw that, although it did include email addresses for a number of “media outlets” it also included many more email addresses that did not appear to fit that description. For example it includes sarah@deschuteslandtrust.org, which is a not-for-profit organization like BMBP, and diane@prinevilleproperties.com, which I believe is a real estate business. It also includes numerous governmental email addresses and emails for fire fighting entities. I cannot think of a rational reason for including these email addresses but not including email contact information for BMBP, an organization that has been actively involved in the planning process for this Project since 2015 and which could have helped publicize this meeting if that were the intent of this email notice list.

6. BMBP's efforts to fully and meaningfully participate in the public involvement process regarding this Project generally, and its ability to raise awareness regarding what it believes is the most relevant science and policy approach for addressing the laminated root rot in the Walton Lake area, were materially prejudiced by the Forest Service's failure to give BMBP actual notice of that meeting. If BMBP had received such notice it would have sent a representative to attend and that representative would have been able to hear what the Forest Service told attendees and to attempt to engage with the Forest Service regarding whatever science or facts it offered to justify its proposals, including the two new plan amendments which were announced in a scoping notice a few weeks later and which may have been discussed, or the science underlying them which may have been presented, at the June 2019 meeting. The fact that BMBP still does not know exactly what was said or presented to the public by the Forest Service at this meeting underscores this prejudice.

7. This was the only public meeting sponsored by the Forest Service during the entire Walton Lake NEPA process. As such it offered a unique opportunity to engage directly with the Forest Service, the meeting's sponsor, and with the members of the public who attended. BMBP's efforts to promote alternative approaches to the Forest Service's policies and plans and to its science were materially prejudiced by not having a representative at this unique meeting.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of October 2022.

s/Paula Hood

Paula Hood  
Co-Director  
Blue Mountains Biodiversity Project